NEUBERGER, QUINN, GIELEN, RUBIN & GIBBER, P.A.

PRICE O. GIELEN

27TH FLOOR

ONE SOUTH STREET THE TOTAL OF THE STREET (410) 332-8561

(410) 332-8550

November 19, 2002

HAND DELIVERED

(410) 332-8584

Honorable Catherine C. Blake United States District Court Judge United States District Court for the District of Maryland 101 West Lombard Street Baltimore, Maryland 21201

RE:

Antwerpen Chevrolet, Ltd., et al. v. Resolution Providers, Inc., et al. Civil Action No. CCB-02-CV-1271

Dear Judge Blake:

We have now received a partial ruling from Magistrate Judge Susan K. Gauvey relating to the numerous documents sought from the Defendants since June, 2002. It has taken this extended period of time to obtain a ruling in large measure due to the lengthy procedures set out in the local rules for the prosecution of a motion to compel. With this ruling, and a second ruling which Magistrate Gauvey has indicated will be forthcoming in the near future, the parties will be able to continue and complete the discovery process. However, due to the delay, the upcoming holidays and outstanding commitments, it is necessary to request an extension of the discovery deadlines. The parties would suggest 90 additional days for discovery. Therefore, the proposed new dates for discovery and other deadlines are as follows:

Plaintiff's Rule 26(a)(2) disclosures re:

Experts

January 31, 2003

Defendant's Rule 26(a)(2) disclosures re:

Experts

February 21, 2003

Plaintiff's rebuttal Rule 26(a)(2) disclosures

re: Experts

March 7, 2003

(Reprosed. CC) Cake 11-19-02

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Discovery Deadline and Status Report due April 10, 2003
Requests for Admission due April 17, 2003
Dispositive Motions May 12, 2003

Although this letter is signed by counsel for the Plaintiff, it is a joint request by all parties. Counsel for the Defendants has reviewed the letter and is in agreement with the request for extension.

Respectfully,

Price O. Gielen

POG:pd

cc: Justin Hawkins, Esquire

(By Fax Machine - 703-893-8029)

Mr. Jeffrey Gruver

(By Fax Machine - 410-531-2211)

Mr. Stanford D. Hess

(By Fax Machine – 410-869-8194)

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